

**GUIDANCE FOR
COMBINING SPCC/FRP AND DPCC/DCR PLANS**

APRIL 10, 1997

This document has been prepared by the United States Environmental Protection Agency (EPA) Region II and the New Jersey Department of Environmental Protection (NJDEP) to assist facilities who wish to combine their Spill Prevention, Control and Countermeasure (SPCC) plans and/or their Facility Response Plans (FRP) required by the EPA, with their Discharge Prevention, Containment and Countermeasure (DPCC) and Discharge Cleanup and Removal (DCR) plans required by the NJDEP. The following conditions must be met in order to satisfy both the federal requirements of 40 CFR 112 and state requirements of N.J.A.C. 7:1E.

- 1) The facility site plan must delineate and differentiate between the areas where oil as defined in 40 CFR 112 is stored or handled and the areas where hazardous substances as defined in N.J.A.C. 7:1E-1.7 are stored or handled.
- 2) The narrative description of the storage and handling areas must specify which areas contain oil as defined in 40 CFR 112 and which areas contain hazardous substances as defined in N.J.A.C. 7:1E-1.7. The description must include a listing of oil products and other hazardous substances stored or handled at the facility. The listing must specify whether the substance is subject to 40 CFR 112 or N.J.A.C. 7:1E-1.7 or both regulations.
- 3) The action plan or contingency plan or Facility Response Plan must discuss the different response to discharges of oil versus the responses to hazardous substance other than oil.
- 4) The combined SPCC and DPCC/DCR plans must be certified in accordance with the requirements of both 40 CFR 112.3(d) and N.J.A.C. 7:1E-4.11.
- 5) The combined SPCC/FRP and DPCC/DCR plans need not follow the sequence outlined in 40 CFR 112.7 or Appendix F. To Part 112.3 (d) or N.J.A.C. 7:1E, but it must address all the requirements of both regulations.
- 6) If the plan does not follow the sequence of 40 CFR 112.7 or the format of Appendix F to Part 112, then a cross reference table must be used. The cross-reference table **must** follow the sequence of 40 CFR 112.7 or the format of Appendix F to Part 112 and list the **page number(s)** and heading where the appropriate information may be found in the plan. Examples of a cross-reference table are attached. A similar cross-reference table is also required if the plan does not follow the sequence of N.J.A.C. 7:1E-4.3 and 4.4.

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40 CFR PART 112
GUIDELINES FOR THE PREPARATION OF SPCC PLANS
CONTENTS OUTLINE

DPCC Cross-Reference
Page #

40CFR § 112.7

(First Paragraph)

- Full Approval of Management
- Implementation schedule of items to be installed

- (a) Description of spill events

- (b) Direction, rate of flow of potential spills

- (c) Secondary Containment and/or diversionary structures
 - (1)(I) Dikes, berms or retaining walls sufficiently impervious
 - (ii) Curbing:
 - (iii) Culverts, gutters, or other drainage systems:
 - (iv) Weirs, booms or other barriers:
 - (v) Spill diversion ponds:
 - (vi) Rent ponds; and/or:
 - (vii) Sorbent materials

- (d) Impracticability of installing structures

The following should be provided:

 - (1) A strong oil spill contingency plan. **[40 CFR § 109]**
 - (2) Written commitment of manpower.

- (e)(1) Facility Drainage (onshore).
 - (I) Drainage from diked areas.
 - (ii) Dike valves.
 - (iii) Undiked area drainage.
 - (iv) Diversion systems.
 - (v) Lift pump installation.

- (e)(2) Bulk storage Tanks (onshore):
 - (I) Tank material and construction
 - (ii) Secondary containment (sufficiently impervious)

40 CFR PART 112
GUIDELINES FOR THE PREPARATION OF SPCC PLANS
CONTENTS OUTLINE

DPCC Cross-Reference
Page #

(e)(2) Bulk storage Tank (onshore)

- (iii) Drainage of rainwater from diked areas
 - (A) By-pass valve sealed closed.
 - (B) Rainwater inspection.
 - (C) By-pass valve opened/closed under supervision.
 - (D) Records are kept of by-pass and drainage events.
- (iv) Buried metallic storage tanks:
- (v) Partially buried metallic storage tanks:
- (vi) Aboveground tank testing:
- (vii) Internal heating coil monitoring:
 - (A) Monitoring steam return
 - (B) Installation of external heating coils.
- (viii) Fail-safe engineered over-fill protection:
 - (A) High liquid level alarm.
 - (B) High liquid level pump cutoff devices.
 - (C) Direct signal between gauger and pumping station.
 - (D) Fast response system.
 - (E) Inspection of sensing devices.
- (ix) Plant effluent observed frequently to detect upsets.
- (x) Oil leaks from tanks promptly corrected.
- (xi) Mobile/portable storage tanks.

(e)(3) Facility transfer operations, pumping, and in-plant process

- (i) Corrosion protection of buried pipelines.
- (ii) Pipeline terminal connections are capped or blank flanged.
- (iii) Pipe supports are designed to minimize abrasion.
- (iv) Aboveground pipelines inspections.
- (v) Vehicles warned to avoid aboveground piping.

(e)(4) Facility tank car and tank truck loading/unloading

- (i) Loading/unloading procedure meet DOT requirements.

40 CFR PART 112
GUIDELINES FOR THE PREPARATION OF SPCC PLANS
CONTENTS OUTLINE

DPCC Cross-Reference
Page #

- (e)(4) Facility tank car and tank truck loading/unloading.....
 - (ii) Loading rack containment.
 - (iii) Vehicular departure prevention.
 - (iv) Tank truck/car inspection.
- (e)(5) Oil production facilities
 - (i) Definition of onshore production facility.
 - (ii) Drainage:
 - (A) Tank battery drainage.
 - (B) Field Drainage.
 - (iii) Bunk storage tanks:
 - (A) Tanks compatible with fluids stored.
 - (B) Secondary containment for tank batteries.
 - (C) Tank Inspections.
 - (D) Fail-safe engineered overfill protection:
 - (1) Assurance of adequate tank capacity.
 - (2) Overflow equalizing lines.
 - (3) Vacuum protection.
 - (4) High level sensors.
 - (iv) Facility transfer operations:
 - (A) Valve/pipeline inspection.
 - (B) Salt water disposal facility inspection.
 - (C) Flowline maintenance.
- (e)(6) Oil drilling and workover facilities. (onshore)
- (e)(7) Oil drilling and workover facilities. (offshore)
- (e)(8) Inspections and records

**40 CFR PART 112
GUIDELINES FOR THE PREPARATION OF SPCC PLANS
CONTENTS OUTLINE**

DPCC Cross-Reference
Page #

(e)(9) Security

- (i) Fencing.
- (ii) Locking of tank valves.
- (iii) Electronic isolation of oil pumps.
- (iv) Loading and unloading connections.
- (v) Facility lighting.

(e)(10) Personnel, training and spill prevention procedures:

- (i) Personnel instruction.
- (ii) Person accountable for spill prevention.
- (iii) Spill prevention briefing.

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